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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

MENTOR GRAPHICS CORPORATION, an
Oregon corporation,

Plaintiff and Counter-Defendant,

v.

EVE-USA, INC., a Delaware corporation, and
**SYNOPSYS EMULATION AND
VERIFICATION S.A.**, formed under the laws of
France,

Defendants and Counter-Claimants.

SYNOPSYS, INC., a Delaware corporation, **EVE-
USA, INC.**, a Delaware corporation, and
**SYNOPSYS EMULATION AND
VERIFICATION S.A.**, formed under the laws of
France,

Plaintiffs and Counter-Defendants,

v.

MENTOR GRAPHICS CORPORATION, an
Oregon corporation.

Defendant and Counter-Claimant.

Case No. 3:10-cv-00954-MO (Lead)

Case No. 3:12-cv-01500-MO

Case No. 3:13-cv-00579-MO

**DECLARATION OF SCOTT
LONARDO IN SUPPORT OF
SYNOPSYS' OMNIBUS
MOTION *IN LIMINE***

DECLARATION OF SCOTT LONARDO IN SUPPORT OF SYNOPSYS'
OMNIBUS MOTION *IN LIMINE*

I, SCOTT LONARDO, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the Bar of the State of California, admitted *pro hac vice* in the District of Oregon, and an associate attorney with the law firm of Orrick, Herrington & Sutcliffe, LLP, attorneys for Synopsys, Inc., EVE-USA, Inc., and Synopsys Emulation and Verification S.A. (collectively “Synopsys”), a party to the above-captioned action. I make this declaration based on personal knowledge, and if called as a witness, I could and would testify competently as follows.

2. Attached hereto as Exhibit 1 is a true and correct copy of correspondence from the Court to Counsel regarding the Court’s Order of August 19, 2014, Docket No. 591.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the Opening Expert Report of Dr. Stephen Degnan, dated April 22, 2014. **FILED UNDER SEAL.**

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the June 18, 2014 deposition of Stephen Degnan. **FILED UNDER SEAL.**

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the Reply Report of Dr. Stephen Degnan, dated June 2, 2014. **FILED UNDER SEAL.**

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from Mentor’s First Supplemental Responses to Synopsys’s Ninth Set of Interrogatories (Nos. 59 – 61, 64 – 67), dated January 21, 2014. **FILED UNDER SEAL.**

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from Mentor’s Objections and Responses to Synopsys’ Third Notice of Rule 30(b)(6) Deposition, dated December 11, 2013.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the transcript of the December 12, 2013 deposition of James Kenney. **FILED UNDER SEAL.**

9. Attached hereto as Exhibit 8 is a true and correct copy of Mentor's Corrected Third Supplemental Initial Disclosures, dated June 4, 2014.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the transcript of the June 3, 2014 deposition of Donald Cantow in Case No. 3:12-CV-06467-MMC (N.D. Cal.). **FILED UNDER SEAL.**

11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the transcript of the December 19, 2013 deposition of Gabriele Pulini. **FILED UNDER SEAL.**

12. Attached hereto as Exhibit 11 is a true and correct copy of Synopsys' Tenth Set of Interrogatories to Mentor (No. 68).

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from Mentor's Objections and Responses to Synopsys's Tenth Set of Interrogatories (No. 68), dated October 22, 2013.

14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the Opening Expert Report of Dr. Sarrafzadeh Regarding Asserted Mentor Graphics Patents, dated April 22, 2014. **FILED UNDER SEAL.**

15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from the Reply Expert Report of Dr. Sarrafzadeh, dated June 2, 2014. **FILED UNDER SEAL.**

16. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from Mentor's Infringement Claim Charts, dated March 17, 2014. **FILED UNDER SEAL.**

17. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the transcript of the April 9, 2014 deposition of Vivek Prasad. **FILED UNDER SEAL.**

18. Attached hereto as Exhibit 17 is a true and correct copy of excerpts from Mentor's Infringement Claim Charts dated October 23, 2006 in *Mentor Graphics Corp. v. EVE-USA, Inc.*, Case No. 6:06-cv-341-AA (D. Or.).

19. Attached hereto as Exhibit 18 is a true and correct copy of a document bearing Bates numbers MENT_E029840 to MENT_E029849 produced in *Mentor Graphics Corp. v. EVE-USA, Inc.*, Case No. 6:06-cv-341-AA (D. Or.) and cited in Mentor's Infringement Claim Charts dated October 23, 2006 in that case.

20. Attached hereto as Exhibit 19 is a true and correct copy of a chart showing documents Mentor identifies as those Dr. Sarrafzadeh relied upon in preparing his opening expert report.

21. Attached hereto as Exhibit 20 is a true and correct copy of an order in *Edwards Lifesciences LLC v. Medtronic Corevalve LLC*, No. 1:12-cv-0023-GMS, Dkt. No. 151 (D. Del. Jan. 2, 2014).

22. Attached hereto as Exhibit 21 is a true and correct copy of a document bearing Bates numbers 954MENT-0764189 to 954MENT-0764195. **FILED UNDER SEAL.**

23. Attached hereto as Exhibit 22 is a true and correct copy of a document bearing Bates numbers 954MENT-0764791 to 954MENT-0764824.

24. Attached hereto as Exhibit 23 is a true and correct copy of a document bearing Bates numbers 954MENT-0764832 to 954MENT-0764849.

25. Attached hereto as Exhibit 24 is a true and correct copy of a document bearing Bates numbers 954MENT-0764770 to 954MENT-0764790.

26. Attached hereto as Exhibit 25 is a true and correct copy of a document bearing Bates numbers 954MENT-0764427 to 954MENT-0764493.

27. Attached hereto as Exhibit 26 is a true and correct copy of excerpts from the transcript of the December 13, 2013 deposition of Luc Burgun. **FILED UNDER SEAL.**

28. Attached hereto as Exhibit 27 is a true and correct copy of excerpts from the Opening Report of Suzanne Stuckwisch, dated April 22, 2014. **FILED UNDER SEAL.**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed in Menlo Park, California on September 10, 2014.

/s/Scott Lonardo

Scott Lonardo